
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

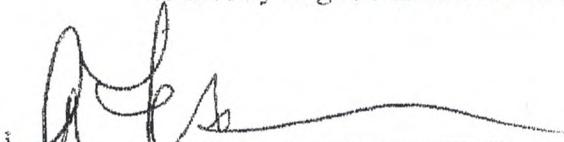
In Re:) Case No.: 21-01118
Abigail Ferstein)
) Chapter 13
Debtor(s))
) Judge Timothy A. Barnes

AFFIDAVIT IN SUPPORT OF MOTION TO MODIFY THE PLAN POST
CONFIRMATION

I, Debtor, Abigail Ferstein, state that:

1. I filed for Chapter 13 relief on January 27, 2021.
2. My Chapter 13 plan was confirmed on April 15, 2021.
3. Per my confirmed plan, my payments are \$742 for 3 months and then \$933 for 57 months with my unsecured creditors receiving 100% of their claims.
4. I currently have a plan payment default in my case of \$1,466.
5. My confirmed plan provides for payments to Mr. Cooper for pre-petition mortgage arrears in the amount of \$11,586.81 for the property located at 20 Hoover Ct #A Streamwood, IL 60107 and my confirmed plan provides for payments to The Manors of Oak Knoll Condominium Association for pre-petition arrears in the amount of \$7,406.30 for the property located at 20 Hoover Ct #A Streamwood, IL 60107.
6. My counsel had filed a motion before the Court to authorize a short sale on my property located at 20 Hoover Ct #A Streamwood, IL 60107 and that motion was granted on August 19, 2021 and the short sale has closed.
7. In my case, The Manors of Oak Knoll Condominium Association has withdrawn their claim for pre-petition arrearage.
8. In my case, Mr. Cooper has not withdrawn their claim for pre-petition arrearage and since the pre-petition mortgage arrears are covered in the short sale, I am requesting my plan to be amended to remove the pre-petition arrears to Mr. Cooper and direct that the Trustee shall make no payments to Mr. Cooper for the pre-petition arrears.

9. In my case, my counsel had filed an objection to the Internal Revenue Service's proof of claim 15-1 and that objection was sustained on October 28, 2021 and the priority portion of proof of claim 15-1 filed by the Internal Revenue Service in my case was reduced to the amount of \$3,303.07.
10. With the withdrawal of the condominium association claim, the reduction to Internal Revenue Service's priority amount and with my short sale closed, I am looking to reduce my plan payment as the amount of debt in my case has decreased and I have had an increase in my expenses and my rent has increased.
11. I am seeking to modify my plan post-confirmation to reduce my plan payment to \$620 a month beginning December 2021 until the end of the plan with my unsecured creditors receiving 100% of their claims.
12. I am seeking to modify my plan post-confirmation to defer the current trustee default to the end of the plan.
13. I am seeking to modify my plan post-confirmation to remove the pre-petition arrears to Mr. Cooper and direct that the Trustee shall make no payments to Mr. Cooper for the pre-petition arrears as my short sale has closed.
14. I want to successfully complete my Chapter 13 plan and I am filing the motion to modify in good faith and ask that the Court modify my plan.



Abigail Feinstein

Subscribed and sworn to before me this 8 day of Nov, 2021.



Mary Crow
Notary Public

My commission expires 01/25, 2023.

